



Curtis Media Group

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Via Electronic Comment Filing System

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20544

Re: In the Matter of Revitalization of the AM Radio Service
MB Docket No. 13-249

Dear Ms. Dortch:

I am the owner of Curtis Media Group, Inc. ("CMG"), and I own over 30 radio stations throughout North Carolina, including 17 AM stations. I began my career as a broadcaster on WKMT(AM) in Kings Mountain, North Carolina, in 1957 as an announcer at age 16, and I became the licensee of an AM Station in Cherryville, North Carolina, in 1965. Thus, I have nearly 60 years of experience in radio broadcasting.

While CMG's current operations include a number of full power AM stations in large metro markets, CMG also operates a number of small-market AM stations. I very much appreciate the Commission's interest in proposals to support and revitalize the AM broadcast service.

I offer the following comments for the Commission's consideration in the AM revitalization proceeding:

*Elimination of the 25-Mile Rule
For AM Station Use of FM Translators*

I applaud the Commission's efforts in making FM translator stations available for use with AM stations. However, under the current FM translator rules, AM stations are at a disadvantage with FM stations. Currently, an AM station can only use a FM translator where the entire 60 dBu contour of the FM translator is

contained within the lesser of (a) the 2 mV/m daytime contour of the AM station being rebroadcast, or (b) a 25-mile radius centered at the AM station's transmitter site. The so-called "25-mile rule" only applies to AM stations and is significantly more limiting to AM stations than the rule applicable to FM stations. For FM stations, the rule only restricts fill-in FM translators to the primary FM station's protected coverage contour *without* a mileage limitation—effectively permitting FM stations to use fill-in FM translators that are located significantly more than 25 miles away from the FM transmitter site. Accordingly I recommend that the Commission eliminate the AM 25-mile rule so that AM stations can use FM translators on the same basis as that enjoyed by FM stations.

Improve AM Receiver Quality

Another concern of mine is that the quality of AM receivers has greatly diminished over the years. Radio receivers are just as important as—if not more important than—the transmitter in both the quality and the strength of the signal received by the listener. No matter what rule changes are made to the AM service on the transmission side, until and unless the receivers are improved, the Commission will not accomplish the stated goal of improving reception and revitalizing AM stations. Even minor improvements in the quality of AM receivers would have an enormous impact on the quality of the AM signal received. Thus, I encourage the Commission to evaluate and strengthen AM receiver standards in this proceeding.

Continuous Tuning Across AM and FM Bands

In addition to improving the quality of AM receivers, another change that would help AM stations would be to require that all radio receivers have both the AM and FM bands on one continuous band for tuning purposes. By that I mean, when a listener scans the radio "dial," the set would be built so that the radio would automatically tune from 550 AM through 107.9 FM without the listener having to manually switch bands. This again would increase the opportunity for AM stations to be on the same footing with FM stations.

Relaxation of Directional AM Protection

Finally, I encourage the Commission to reevaluate its AM directional protection rules. CMG currently operates a number of directional AM stations, and in our experience the protection afforded to those stations in many cases is unnecessary because the areas protected are well outside of our local market areas.

The AM stations that are required to protect these directional stations under the current rules do so to the detriment of their local service coverage.

For example, CMG's station WPTF(AM) is required to protect directional station WCBM(AM) in Baltimore. The current rules are overly protective, however, as they have the effect of, on the one hand, significantly limiting WPTF(AM)'s signal in Wake Forest, NC, which is part of WPTF(AM)'s local market while, on the other hand, protecting WCBM(AM)'s signal in Southern Virginia, which is well outside of the Baltimore market.

It would seem that improvement of local coverage of one station is more equitable than preservation of distant coverage of another. Accordingly, I encourage to Commission to relax the AM directional protection rules so that protection is not afforded beyond a station's local market area.

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I applaud the Commission's efforts to support, improve, and revitalize AM radio. I am pleased to have this opportunity to submit my comments in this letter for the Commission's consideration, and I look forward to developments in this proceeding.

Respectfully submitted,



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